



"Quillen, Todd"
<TQuillen@TechLawInc.com>
>

06/15/2006 09:05 AM

To "Billus, Jill" <JBillus@techlawinc.com>

cc Stephanie Carr/R1/USEPA/US@EPA

bcc

Subject FW: Intelidata Data Gaps

Jill,

Thanks for looking into this to help us get ready for the meeting. I've cc'd Stephanie. Stephanie – Please consider these Draft but I think they do give us some good talking points for the meeting.

I will go through these in more detail next week.

Todd W. Quillen
(617) 720-0320 ext. 124

RCRA RECORDS CENTER

FACILITY CEE ASSCC

I.D. NO. CTD 04/12/62

FILE LOC. R-9

OTHER # 104462

From: Billus, Jill

Sent: Thursday, June 15, 2006 8:49 AM

To: Quillen, Todd

Subject: Intelidata Data Gaps

Hi, Todd,

I went through most of what I had on Intelidata. Almost everything is from 2003 or later. I've attached a list of things that I think still need to be addressed. I'm also attaching a copy of the site figure for the downgradient property Neeltran. There appear to be numerous wells on this site, but Intelidata is only proposing to sample one overburden well from this site to help define the extent of their VOC plume. They still need to address the bedrock contamination, too.

I have a few more minor documents to go through (most are letters from Stephanie), so I'll let you know if I come up with anything else.

Let me know if you'll need any figures or data tables. I have some in electronic form.

Thanks,



Jill Intelidata Data Gaps - 6_06.doc Neeltran Site Figure0001.pdf

RDMS DocID

104462



Remaining Data Gaps Noted in EPA's Review of the *2003 Annual Report on the Status of Remediation (Annual Report)*

- **Additional soil analyses for non-RCRA 8 metals @ AOC-2 and 3** (I think this comment is originally from Stephanie.) In ERM's response to EPA's comments on the *2003 Annual Report*, dated January 19, 2004, it is stated that "ERM is addressing the assessment requirements for these constituents within AOC-2 and AOC-3 during the upcoming work." No updated info on this subject could be found in any of the recent reports. The only soil data available for AOC-2 and 3 is from 1983.
- **Delineation of extent of soil contamination at AOC-4.** In ERM's response to EPA's comments on the *2003 Annual Report*, dated January 19, 2004, ERM indicates that any remaining soil contamination that had yet to be characterized was beneath the building. This contamination was to be addressed in conjunction with the full-scale implementation of the proposed remediation (oxidant addition) as an oxidant injection point was planned for the area. Recent figures (such as Figure 2 in the *October 2004 Annual Report of the Status of Remediation*) do show four injection points in the vicinity of this AOC, but none are located within the footprint of the building where soil contamination was believed to extend (north of sample location IB-6.) ERM later stated that an institutional control (an ELUR) will be applied to the site, restricting access to this area.
- **Delineation of lateral and vertical extent of soil contamination from AOC 6 (Former Fuel Oil Underground Storage Tank).** In ERM's response to EPA's comments on the *2003 Annual Report*, dated January 19, 2004, ERM indicates that they are unable to confirm the location of this AOC. Groundwater samples were collected from ERM-11, downgradient of this general area and did not contain TPH. ERM also states that "additional soil and groundwater sampling is anticipated during the design of the full-scale remedial program at the Site" but subsequent reports do not present any soil sample results in this area of the site (only the groundwater sampling at ERM-11.)
- **Assessment of PCBs in soil.** I am not quite certain what AOC, if any, that this comment applies to. Some soil sampling was originally conducted near a pad-mounted transformer on the west side of the building, and one sample (TR-4) reported a PCB-1254 concentration (1.3 ppm) slightly above the CT Residential DEC level of 1.0 ppm (see Figure 3 from the January 19, 2004 response). ERM did sample some downgradient wells for PCBs, all of which were non-detect or below screening levels. It doesn't appear that any additional soil sampling was conducted in the vicinity of TR-4.

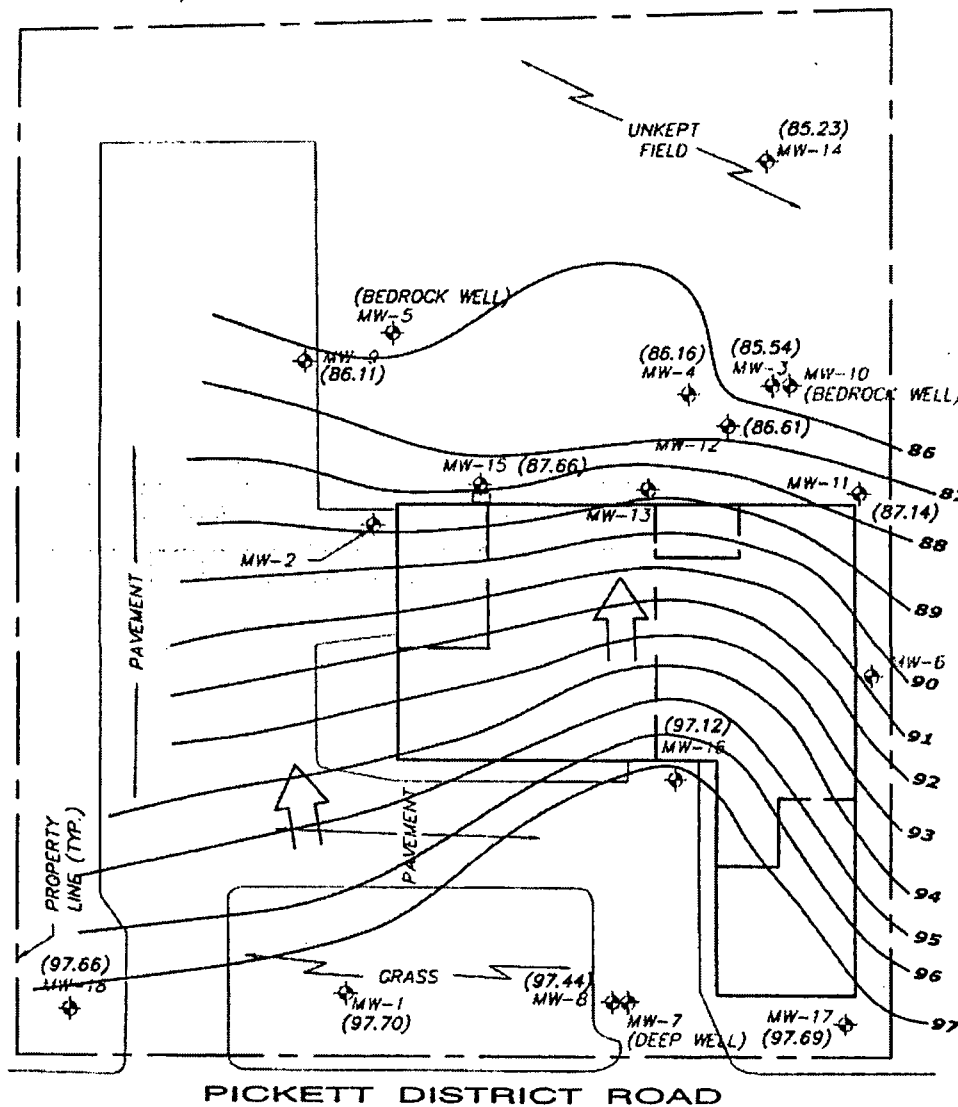
Additional Data Gaps (as noted in TechLaw's March 6, 2006 review of Response to EPA Comments on the 2004 Annual Report on Status of Remediation).

- The facility has yet to address plume stability in the overburden aquifer. While ERM was able to obtain data from one off-site Neeltran well to help delineate the extent of contamination in the overburden, additional results will be necessary to address plume stability. The most recent ERM submittal noted that additional sampling is planned, but it was not clear whether only one off-site well would be sampled or several. The Neeltran property site figure appears to show numerous shallow, deep, and bedrock wells.
- The facility has yet to define the extent of contamination in the bedrock aquifer and evaluate plume stability. Historic results from bedrock wells at the site reported exceedances of applicable standards (CT SWPC), but the most recent data available from 2004 did not report any exceedances. The facility is concluding that this decrease in concentrations is due to natural attenuation, but sufficient evidence has not been provided to support this argument. Since there are no downgradient bedrock wells beyond BR-5, it is also not clear whether contamination may have migrated downgradient rather than attenuated.
- QAPP – The facility was supposed to submit one to EPA prior to its next round of groundwater sampling (as stated in a July 5, 2005 letter from EPA to the facility), but I don't know whether this ever happened.
- Schedules for completion of work, including tasks necessary to fill the Migration of Contaminated Groundwater Under Control data gaps
- Target date for submittal of the Migration of Contaminated Groundwater Under Control Environmental Indicator checklist

HOUSATONIC RIVER (~150 FEET EAST OF PROPERTY LINE)

N/F CONRAIL RAILROAD CO.

KIMBERLEY CLARK (TRACTOR TRAILER PARKING LOT)



EDELMAN MANUFACTURING (80 PICKETT DISTRICT ROAD)

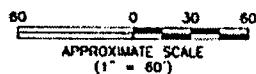
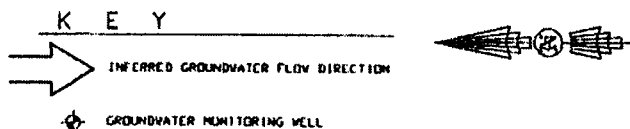


FIGURE 3
REVISED INFERRED
GROUNDWATER
CONTOUR MAP (4/7/03)
NEELTRAN, INC.
71 PICKETT DISTRICT RD.
NEW MILFORD, CT
HRP # BAN8015.HG
SCALE 1" = 60'±

HRP Associates, Inc.
Creating the Right Solutions Together
Connecticut, New York, Massachusetts, Pennsylvania, South Carolina
187 New Britain Avenue
Plainville, Connecticut 06062
Ph: (860)793-6899 Fax: (860)793-6871
www.hrpassociates.com

2105 BRIDGE - BANGOR, CT, INC. 71 PICKETT DISTRICT ROAD, NEW MILFORD, CT 06455-1000
 2105 BRIDGE - BANGOR, CT, INC. 71 PICKETT DISTRICT ROAD, NEW MILFORD, CT 06455-1000